

Exhibit 6

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

8 : CASE NO.
9 THIS DOCUMENT : 1:17-MD-2804
10 RELATES TO ALL CASES:

 : Hon. Dan A.
 : Polster

11 - - -

 Friday, August 3, 2018

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13 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
14 CONFIDENTIALITY REVIEW

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16 Videotaped deposition of
17 CHRISTOPHER ZIMMERMAN, taken pursuant to
18 notice, was held at the law offices of
19 Reed Smith, LLP, Three Logan Square, 1717
20 Arch Street, Suite 3100, Philadelphia,
21 Pennsylvania 19103, beginning at 9:00
22 a.m., on the above date, before Amanda
23 Dee Maslynsky-Miller, a Certified
24 Realtime Reporter.

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22

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24

1 Q. Okay. Before 1998, what was
2 the method of calculating a threshold at
3 AmerisourceBergen?

4 MR. NICHOLAS: Same
5 objection. Outside the scope of
6 the 30(b)(6).

7 THE WITNESS: The method of
8 calculating the threshold prior to
9 that was that you would -- all
10 pharmacies would be in one
11 category, hospitals would be in
12 another category. You take all
13 the pharmacies within that
14 category and divide by the number
15 of pharmacies to come up with an
16 average volume for the month per
17 drug category. And then there was
18 a multiplier of three. Any order
19 that was over the threshold amount
20 would be produced an excessive
21 order report.

22 BY MR. PIFKO:

23 Q. But it would still be
24 shipped?

1 A. The product?

2 Q. Yes.

3 A. Yes.

4 Q. After 1998, what was the
5 practice with respect to calculating
6 thresholds?

7 MR. NICHOLAS: Same
8 objection. Outside the scope.

9 THE WITNESS: So in 1996, we
10 worked with DEA, for two years,
11 on -- in order to provide DEA with
12 more -- we feel, more accurate
13 information, that we worked on a
14 project to where we would identify
15 a customer based upon its own
16 purchase history versus all
17 pharmacies in one big bucket.

18 And then we calculated a
19 rolling four-month average of that
20 pharmacy's purchases. And then
21 created a multiplier of three to
22 identify a trigger that would
23 identify a suspicious order.

24 BY MR. PIFKO: